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ESTTA211080 05/13/2008

Filing date:

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92048850	
Party	Defendant FORD MOTOR COMPANY	
Correspondence Address	Elizabeth F. Janda, Matthew R. Mowers Brooks Kushman P.C. 1000 Town Center, 22nd Floor Southfield, MI 48075 UNITED STATES ejanda@brookskushman.com, mmowers@brookskushman.com, smgibbons@brookskushman.com	
Submission	Stipulated/Consent Motion to Extend	
Filer's Name	Elizabeth F. Janda	
Filer's e-mail	ejanda@brookskushman.com, smgibbons@brookskushman.com, cingrao@brookskushman.com, makammer@kammerbrowning.com	
Signature	/elizabeth f janda/	
Date	05/13/2008	
Attachments	Consente.pdf (3 pages)(66555 bytes)	

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

ARION PERFUME & BEAUTY,)	
INC.	_)	
	.)	
Petitioner,)	
)	
v.)	Cancellation No. <u>92048850</u>
)	Registration No. 2770412
FORD MOTOR COMPANY)	
	·)	
Registrant.	.)	
_		<u>.</u> .

CONSENTED MOTION TO EXTEND ALL DISCOVERY AND TRIAL DATES

Filed Electronically Commissioner for Trademarks 2900 Crystal Drive Arlington, Virginia 22202-3513

Sir:

Registrant, FORD MOTOR COMPANY, with the express consent of attorney for the Petitioner Mark Kammer, hereby moves the Trademark Trial and Appeal Board for a 30 day extension of all discovery and trial dates. Petitioner and Registrant have held the Discovery Conference, and need to extend the deadlines for the Initial Disclosures and all discovery and trial dates.

The schedule of all Discovery and Trial Dates should read as follows:

Initial Disclosures Due 6/19/2008

Expert Disclosures Due 10/17/2009

Discovery Closes 11/16/2009

U.S. Registration No. 2,770,412

Cancellation No. 92048850

Plaintiff's Pretrial Disclosures 12/31/2008

Plaintiff's 30 Day Trial Period Ends 2/14/2009

Defendant's Pretrial Disclosures 3/1/2009

Defendant's 30 Day Trial Period Ends 4/15/2009

Plaintiff's Rebuttal Disclosures 4/30/2009

Plaintiff's 15 Day Rebuttal Period Ends 5/15/2009

Counsel for Applicant has expressly consented to service of this document by e-mail.

Respectfully submitted,

. FORD MOTOR COMPANY

Elizabeth F. Janda

Attorneys/Agents for Opposer

Date: May 13, 2008

(Filed electronically via USPTO.ESTTA)

BROOKS KUSHMAN P.C.

1000 Town Center, 22nd Floor

Southfield, MI 48075 Phone: 248-358-4400 Fax: 248-358-3351

email: ejanda@brookskushman.com

Our File: FMCTA 21423 OC

CERTIFICATE OF TRANSMITTAL

I hereby certify that this correspondence is being electronically transmitted in PDF format to the Trademark Trial and Appeal Board through the Electronic System for Trademark Trials and Appeals (ESTTA) on the following date:

Date: May 13, 2008

Elizabeth F. Janda

CERTIFICATE OF SERVICE

I hereby certify that this correspondence is being served on counsel for Arion Perfume & Beauty, Inc., Mark A. Kammer, via email at makammer@kammerbrowning.com and First Class Mail at Kammer Browning PLLC, 7700 Broadway, Suite 202, San Antonio, Texas 78209 on the following date:

Date: May 13, 2008

Elizabeth F. Janda